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6 Attorney for Jose Carrillo-Garcia
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JOSE CARRILLO-GARCIA,
14 Defendant.
15

Case No.: 2:20-cr-00007-GMN-DJA

UNOPPOSED MOTION FOR THE
PREPARATION OF PRE-PLEA
PRESENTENCE REPORT (PSR)

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17 The defendant, Jose Carrillo-Garcia, by and through his counsel of record, Rene L.
18 Valladares, Federal Public Defender, and Brandon C. Jarock, Assistant Federal Public
19 Defender, files this Unopposed Motion for the Preparation of Pre-Plea Presentence Report. This
20 pleading is based upon the attached Memorandum of Points and Authorities and all of the
21 papers and pleadings on file herein.

22 DATED this 9th day of April, 2020.

23 RENE L. VALLADARES
Federal Public Defender

24 By: /s/Brandon C. Jarock
25 BRANDON C. JAROCK
Assistant Federal Public Defender
26 Attorney for Jose Carrillo-Garcia

MEMORANDUM POINTS AND AUTHORITIES

On January 15, 2020, Mr. Carrillo-Garcia was charged in a one-count criminal Indictment with being a Deported Alien Found in the United States, in violation of 8 U.S.C. § 1326. ECF No. 1. The parties have entered into a plea agreement in which Mr. Carrillo-Garcia will plead guilty to the one-count Indictment and the parties will recommend a sentence of time-served.

In light of the terms of the plea agreement, the Court has granted the parties' request to have the change of plea and sentencing hearing held together, which is scheduled for July 1, 2020, at 10:30 am. ECF No.'s 22, 24, & 25.

Therefore, there will be a need for the presentence investigation report to be ordered and completed before the change of plea and sentencing hearings. As a result, Mr. Carrillo-Garcia requests this Court order the preparation of a pre-plea presentence investigation report. Undersigned counsel has spoken with AUSA Kimberly Frayn, and she does not oppose this motion.

DATED this 9th day of April 2020.

Respectfully submitted,
RENE L. VALLADARES
Federal Public Defender

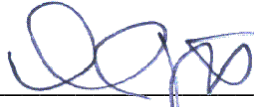
By: /s/ Brandon C. Jaroch

BRANDON C. JAROCH
Assistant Federal Public Defender
Attorney for Jose Carrillo-Garcia

ORDER

The Court having found good cause therein, IT IS HEREBY ORDERED that United States Probation prepare a pre-plea presentence investigation report.

DATED: April 10, 2020



Daniel J. Albregts
United States Magistrate Judge

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on April 9, 2020, he served an electronic copy of the above and foregoing

UNOPPOSED MOTION FOR THE PREPARATION OF PRE-PLEA PRESENTENCE REPORT (PSR) by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH
United States Attorney
KIMBERLY M. FRAYN
Assistant United States Attorney
501 Las Vegas Blvd. So
Suite 1100
Las Vegas, NV 89101

/s/ Marcus A. Walker
Employee of the Federal Public Defender